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February 27, 2002

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

William F. Caton, Acting Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

**Re: Ex Parte Presentation; Inquiry Concerning High-Speed Access to the Internet Over Cable and Other Facilities, Gen Docket No. 00-185**

Dear Mr. Caton:

On February 26, 2002, James R. Coltharp of Comcast Corporation and I met with Stacy Robinson, Legal Advisor to Commissioner Abernathy, and then with Dan Gonzalez and Catherine Bohigian, Senior Legal Advisor and Legal Advisor, respectively, to Commissioner Martin. Our presentation largely addressed matters that have already been covered in Comcast's prior written submissions in this docket. In addition, we noted that public statements from multiple Commissioners about the importance of providing regulatory certainty are consistent with Comcast's stated preference for a prompt resolution of the "forced access" issue. We also noted that classification of cable Internet service as an interstate information service necessarily (under *Computer II*) entails a determination that this service should remain fenced off from state and federal regulation (except insofar as the Commission may later exercise its ancillary Title I authority).

We also used the opportunity to provide information about Comcast's announcement of its new commercial agreement with United Online. Copies of the joint press release of Comcast and United Online were given to Ms. Robinson, Mr. Gonzales, and Ms. Bohigian. We pointed out that this announcement, coming just two weeks after Comcast completed transitioning customers from Comcast@Home to Comcast.net, provides concrete evidence of Comcast's intention to afford high-speed Internet customers a choice of ISPs and of the ability of industry participants to make the necessary arrangements through voluntary, commercial negotiations.

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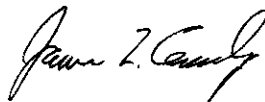
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Pursuant to section 1.1206(b)(2) of the Commission's rules, an original and one copy of this letter are being filed with the Office of the Secretary. A copy of this letter is also being sent to each of the FCC staff members with whom we met. Please let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "James L. Casserly".

James L. Casserly

Enclosure

cc: Stacy Robinson  
Dan Gonzalez  
Catherine Bohigian

WDC 308577v1



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**FOR IMMEDIATE RELEASE**

**COMCAST and UNITED ONLINE to OFFER NETZERO and JUNO  
HIGH-SPEED INTERNET SERVICE**

*United Online's NetZero and Juno ISPs to enter broadband market;  
Comcast to provide customers with choice of ISPs*

**February 26, 2002 – PHILADELPHIA, PA and WESTLAKE VILLAGE, CA, -** Comcast Corporation. (Nasdaq: CMCSA, CMCSK), one of America's largest cable providers, and United Online, Inc. (Nasdaq: UNTD), a leading value-priced Internet service provider, today announced an agreement to offer high-speed Internet service over Comcast's cable systems.

The agreement enables United Online – which owns the NetZero and Juno value-priced Internet services – to offer broadband access for the first time. Comcast will for the first time provide its customers a choice of Internet service providers (ISPs).

This agreement will make a high-speed United Online Internet service available within 90 days to Comcast customers in two major metropolitan areas, Nashville, TN and Indianapolis, IN. It also provides a template for a subsequent national rollout of United Online's Internet service to anyone who can get Comcast cable.

Comcast Corporation is the third largest cable operator in the United States, with more than 8.4 million subscribers. It currently provides broadband service through its own ISP, Comcast High-Speed Internet, to more than 950,000 customers nationwide. United Online's NetZero and Juno Online Services had 5.6 million active dial-up users, including 1.46 million billable subscribers, as of Dec. 31, 2001.

"Comcast is pleased to offer customers a choice of Internet service providers," said Brian L. Roberts, president of Comcast Corporation. "Until about two months ago, Comcast was contractually bound to a single Internet service provider. We have

moved quickly to provide customers with true choice and value, while creating sound business opportunities for United Online and Comcast.

"United Online is committed to making fast Internet service widely available and they have a strong track record in the marketplace," Roberts added. "We are delighted to be working with them."

"To date, United Online has been reluctant to enter the broadband marketplace. Many of the ISPs entering the market have incurred large capital expenditures while generating gross profits per user much below their dial-up business," said Mark R. Goldston, chairman, president and CEO of United Online. "We are very excited to be announcing this landmark deal with a quality company like Comcast Corporation. We believe it will provide a turnkey solution that should require little to no capital expenditures by United Online."

"We also believe the agreement will allow us to generate per-user gross profits at or in excess of our current billable dial-up offerings," added Goldston. "Not only is this agreement an exciting step forward for United Online, it should be a complementary service for our dial-up users who may be looking to easily upgrade to a quality high-speed service from NetZero or Juno."

Terms of the agreement are confidential. In the two Comcast markets where United Online is deploying its high-speed service, Nashville and Indianapolis, Comcast has about 467,000 cable subscribers and 77,000 high-speed Internet users.

Comcast Corp. will continue to provide Internet service through its own ISP, Comcast High-Speed Internet. Comcast's agreement with United Online is not exclusive and does not preclude Comcast from making other ISPs available to its customers in the future.

United Online will announce details of its initial broadband offering at a later date. The agreement between Comcast and United Online features a marketing partnership in which Comcast will provide United Online with the ability to advertise its NetZero and Juno brands on the Comcast cable systems and through a variety of other media links on Comcast.net.

United Online's NetZero and Juno services currently provide dial-up Internet service. Existing users will be able to obtain high-speed Internet service without giving up their NetZero or Juno e-mail addresses. They also will continue to get the same start page. NetZero and Juno currently offer limited free service as well as value-priced access with no banner advertising, longer surfing time and faster page loads for \$9.95 a month.

This release contains forward-looking statements within the meaning of the "safe harbor" provisions of the Private Securities Litigation Reform Act of 1995. These include statements regarding United Online's proposed broadband service, expected future financial performance, expected growth in its billable subscriber base and

quotes from management in this press release. These statements are based on management's current expectations or beliefs and are subject to a number of risks and uncertainties that could cause actual results to differ materially from those described in the forward-looking statements. The potential risks and uncertainties include, among others that the United Online broadband service will be launched within the time periods anticipated, if at all; that United Online will not incur capital expenditures or will generate anticipated gross profits per user; and that the United Online broadband service will be commercially successfully. More information about potential factors that could affect the company's business and financial results is included in the company's Form 10-Q and other filings with the Securities and Exchange Commission (<http://www.sec.gov/>) including (without limitation) information under the captions "Management's Discussion and Analysis of Financial Condition and Results of Operations" and "Risk Factors."

Comcast Corporation and United Online, Inc. will hold a press conference call today, February 26, 2002, at 2:00 p.m. Eastern Time (ET). The conference call will be broadcast live via the Internet at [www.cmcsk.com](http://www.cmcsk.com). A recording of the call will be available on the Company's website from 4:00 p.m. ET on February 26, 2002 through midnight ET on February 27, 2002.

Those parties interested in participating via telephone should dial (800) 446-2782. A telephone replay will begin immediately following the call until February 27, 2002 at midnight ET. To access the rebroadcast, please dial (888) 843-8996 and enter code 5440262.

#### **About United Online, Inc.**

United Online is a leading Internet Service Provider. The company commenced operations in September 2001 with the merger of NetZero and Juno Online Services -- two of the leading Internet access brands in the United States and Canada. Through its subsidiaries, United Online offers both free and value-priced Internet access services in more than 5,000 cities. The company is headquartered in Westlake Village, Calif., with offices in New York City and Hyderabad, India. United Online's common stock is traded on the Nasdaq National Market under the ticker symbol "UNTD." For more information about United Online and its Internet access services, please visit <http://www.unitedonline.net>.

#### **About Comcast**

Comcast Corporation ([www.comcast.com](http://www.comcast.com)) is principally involved in the development, management and operation of broadband cable networks, and in the provision of electronic commerce and programming content. Comcast Cable is the third largest cable company in the United States serving more than 8.4 million cable subscribers. Comcast's commerce and content businesses include majority ownership of QVC, Comcast-Spectacor, Comcast SportsNet, The Golf Channel, Outdoor Life Network, a controlling interest in E! Networks, and other programming investments. Comcast's Class A Special and Class A Common Stock are traded on The Nasdaq Stock Market under the symbols CMCSK and CMCSA, respectively.

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